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**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:
	:
	: Chapter 11
LEHMAN BROTHERS HOLDINGS, INC., et al.,	: Case No. 08-13555-JMP
	:
Debtors.	: (Jointly Administered)
	:
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**LIMITED OBJECTION AND RESERVATION OF RIGHTS WITH REGARD TO  
DEBTORS' THIRD AMENDED JOINT PLAN OF LEHMAN BROTHERS HOLDINGS  
INC. AND ITS AFFILIATED DEBTORS**

Richard Hayne, by and through counsel, files this limited objection and reservation of rights with regard to Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the "Plan"), and respectfully state as follows:

1. On August 31, 2011, Lehman Brothers Holdings Inc. and its debtor affiliates (the "Debtors") filed the Plan.
2. On October 25, 2011, the Debtors filed their Plan Supplement, which included as Exhibit 2, a Schedule of Executory Contracts and Unexpired Leases to be Assumed Pursuant to Section 11.1 of the Plan (the "Assumed Contract List").
3. Richard Hayne entered into a prepaid variable forward contract (the "Contract") dated June 14, 2004, by and between Richard A. Hayne and Lehman Brothers Derivatives, OTC, Inc.

("OTC").

4. The Contract is listed in OTC's schedule G as Derivative Master Account Number 06160RAH.

5. The Contract terminated pursuant to its terms in June 2009.

6. Upon information and belief, Lehman Brothers Inc., as custodian for OTC, has retained Richard Hayne's property after the termination of the Contract.

7. Richard Hayne does not object to the confirmation of the Plan, but seeks to preserve his rights with regard to determining and locating his property.

WHEREFORE, Richard Hayne requests this Court enter an Order (i) confirming the Plan provided that nothing in the Plan shall prevent Richard Hayne from seeking the return of his property pursuant to the Contract.

Respectfully submitted,

Dated: November 4, 2011

/s/ Kristin K. Going  
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